

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION : MDL No. 2804
This document relates to: : Case No. 17-md-2804
Case No. 1:18-op-46327-DAP : Judge Dan Aaron Polster
MICHELLE FROST, LEGAL GUARDIAN OF :
CHILD D.F., and STEPHANIE HOWELL, :
LEGAL GUARDIAN OF CHILD C.L., :
on Behalf of Themselves and All Other :
Similarly Situated Legal Guardians, :
Plaintiffs, :
v. :
ENDO HEALTH SOLUTIONS INC.; ENDO :
PHARMACEUTICALS, INC.; PAR :
PHARMACEUTICAL, INC.; PAR :
PHARMACEUTICAL COMPANIES, INC. f/k/a :
PAR PHARMACEUTICAL HOLDINGS, INC.; :
JANSSEN PHARMACEUTICALS, INC.; :
JANSSEN PHARMACEUTICA, INC. n/k/a :
JANSSEN PHARMACEUTICALS, INC.; :
NORAMCO, INC.; ORTHO-MCNEIL-JANSSEN :
PHARMACEUTICALS, INC. n/k/a JANSSEN :
PHARMACEUTICALS, INC.; JOHNSON & :
JOHNSON; TEVA PHARMACEUTICAL :
INDUSTRIES LTD.; TEVA :
PHARMACEUTICALS USA, INC.; :
CEPHALON, INC.; ALLERGAN PLC f/k/a :
ACTAVIS PLC f/k/a ALLERGAN, INC.; :
ALLERGAN FINANCE, LLC f/k/a ACTAVIS, : INC.
f/k/a WATSON PHARMACEUTICALS, : INC.;
ALLERGAN SALES, LLC; ALLERGAN : USA,
INC.; WATSON LABORATORIES, INC.; :
WARNER CHILCOTT COMPANY, LLC; :
ACTAVIS PHARMA, INC. f/k/a WATSON :
PHARMA INC.; ACTAVIS SOUTH ATLANTIC :
LLC; ACTAVIS ELIZABETH LLC; ACTAVIS :

MID ATLANTIC LLC; ACTAVIS TOTOWA LLC;;
ACTAVIS LLC; ACTAVIS KADIAN LLC; :
ACTAVIS LABORATORIES UT, INC. f/k/a :
WATSON LABORATORIES, INC.-SALT LAKE :
CITY; ACTAVIS LABORATORIES FL, INC. :f/k/a
WATSON LABORATORIES, INC. - :
FLORIDA; :
MALLINCKRODT PLC; MALLINCKRODT LLC;;
SPECGX LLC; DEPOMED, INC.; INDIVIOR, ;
INC.; RICHARD S. SACKLER; JONATHAN D. :
SACKLER; MORTIMER D.A. SACKLER; :
KATHE A. SACKLER; ILENE SACKLER :
LEFCOURT; BEVERLY SACKLER; THERESA :
SACKLER; DAVID A. SACKLER; RHODES :
TECHNOLOGIES; RHODES TECHNOLOGIES :
INC.; RHODES PHARMACEUTICALS L.P.; :
RHODES PHARMACEUTICALS INC.; TRUST :
FOR THE BENEFIT OF MEMBERS OF THE :
RAYMOND SACKLER FAMILY; THE P.F. :
LABORATORIES, INC.; CARDINAL HEALTH, :
INC.; MCKESSON CORPORATION; :
AMERISOURCEBERGEN DRUG CORP.; :
HEALTH MART SYSTEMS, INC.; H. D. SMITH, :
LLC d/b/a HD SMITH f/k/a H. D. SMITH :
WHOLESALE DRUG CO.; H. D. SMITH :
HOLDINGS, LLC; H. D. SMITH HOLDING :
COMPANY; CVS INDIANA, LLC; CVS HEALTH:
CORPORATION; CVS RX SERVICES, INC.; :
DISCOUNT DRUG MART, INC.; HBC SERVICE :
COMPANY; PRESCRIPTION SUPPLY, INC.; :
RITE AID CORPORATION; RITE AID OF :
MARYLAND, INC.; RITE AID OF MARYLAND, :
INC. d/b/a RITE-AID MID-ATLANTIC :
CUSTOMER SUPPORT CENTER, INC.; :
WALGREEN CO.; WALGREENS BOOTS :
ALLIANCE, INC.; WALGREEN EASTERN :
CO.; WAL-MART INC. f/k/a WAL-MART :
STORES, INC.; MIAMI-LUKEN, INC.; and :
COSTCO WHOLESALE CORPORATION; :
: :
Defendants. :
:

INTERROGATORIES
and
REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiffs, Michelle Frost, Legal Guardian of Child Dustin Frost and Stephanie Howell, Legal Guardian of Child Christopher Lewis, on Behalf of Themselves and All Other Similarly Situated Legal Guardians, by and through undersigned counsel, pursuant to Rule 34 of the Federal rules of Civil Procedure, hereby propounded the following Interrogatories and Request for Production of Documents to Defendants, Endo Health Solutions, Inc.; Eno Pharmaceuticals, Inc.; Par Pharmaceutical, Inc.; Par Pharmaceutical Companies, Inc., f/k/a Phar Pharmaceutical Holdings, Inc.; Janssen Pharmaceuticals, Inc.; Janssen Pharmaceutical, Inc. n/k/a Janssen Pharmaceuticals, Inc.; Noramco, Inc.; Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.; Johnson & Johnson; Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Cephalon, Inc.; Allergan PLC f/k/a Actavis PLC f/k/a Allergan, Inc.; Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.; Allergan Sales, LLC; Allergan USA Inc.; Watson Laboratories, Inc.; Warner Chilcott Company, LLC; Actavis Pharma, Inc. f/k/a Watson Pharma Inc.; Actavis South Atlantic, LLC; Actavis Elizabeth, LLC; Actavis Mid Atlantic, LLC; Actavis Totowa, LLC; Actavis, LLC; Actavis Kadian, LLC; Actavis Laboratories UT, Incl f/k/a Watson Laboratories, Inc.-Salt Lake City; Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc.-Florida; Mallinckrodt PLC; Mallinckrodt, LLC; SpecGx LLC; Depomed, Inc.; Indivior, Inc.; Cardinal Health, Inc.; McKesson Corporation; AmerisourceBergen Drugs Corp.; Health Mart Systems, Inc.; H.D. Smith, LLC d/b/a HD Smith f/k/a H.D. Smith Wholesale Drug Co.; H.D. Smith Holdings, LLC; H.D. Smith Holdings Company; CVS Indiana, LLC; CVS Health Corporation; CVS RX Services, Inc.; Discount Drug Mart, Inc.; HBC Service Company; Prescription Supply, Inc.; Rite Aid Corporation; Rite Aid of Maryland, Inc.; Rite Aid of Maryland, d/b/a Rite-Aid Mid-Atlantic Customer Support Center, Inc.; Walgreen Co.; Walgreens Boots Alliance, Inc.; Walgreen Eastern Co.; Wal-Mart, Inc. f/k/a Wal-Mart Stores, Inc.; Miami-Lukens, Inc. and Costco Wholesale Corporation. Your responses

to these interrogatories or requests for production are due within thirty (30) days from the date of service.

DEFINITIONS:

As used in these Interrogatories and Requests:

1. "Child/Baby" means or refers to Dustin D. Frost and/or Christopher Lewis.
2. "Legal Guardian" means or refers to Michelle Frost and/or Stephanie Howell.
3. "Birth Mother" means or refers to Erin Doyle and/or Stephanie Howell.

INTERROGATORIES

1. Please describe any and all toxicological, pharmacological, pharmino-kinetic, longitudinal or other scientific study of opioids conducted on animals in your possession including in the description the title of such studies, date of issuance, who led the study, whether the study was provided to the FDA, and the cost of the study.
2. Please describe any and all toxicological, pharmacological, pharmino-kinetic, longitudinal, clinical trial or other scientific study of opioids conducted on humans in your possession including in the description the title of such studies, date of issuance, who led the study, who funded the study and the cost of the study.
3. Please describe all scientific studies of any sort in your possession, not listed above, that address genotoxicity, teratogenic, mutagenic or development impacts of in utero exposure to opioids.
4. Identify all witnesses you will or may call at the Class Certification Hearing. Provide their full name, address and state the facts you intend to prove and/or disapprove with each witness. State if they are a lay or expert witness; if expert, state their opinions and the basis thereof.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All studies described in your response to Interrogatory Nos. 1, 2 and 3 above.
2. All emails, memos, presentations, white papers or other documents related to your response to Interrogatories Nos. 1, 2 and 3 above.
3. Please provide any and all documents in your possession that contain the words “Neonatal Abstinence Syndrome”, “NAS”, “infant”, “baby(ies)”, “spina bifida” “club foot” or “in utero”.
4. Please provide any and all documents related to studies of rats or rabbits exposed to opioids.
5. All non-privileged documents in your possession relating to:

- Baby:	Dustin Doyle Frost
- Guardian:	Michelle Frost
- Birth Mother:	Erin Doyle
- Birth City:	Circleville, OH

and

- Baby:	Christopher Lewis
- Guardian:	Stephanie Howell
- Birth Mother:	Stephanie Howell
- Birth City:	Washington Township, OH

and

- Expert:	Harvey Rosen
- Expert:	Charles Vyvyan Howard
- Expert:	Charles Livingston Werntz, III

6. All documents, things, charts or demonstrative evidence you will or may use at the Class Certification Hearing.
7. Produce all prescription records for Dustin D. Frost and Christopher Lewis within one hundred fifty (150) miles of Circleville, OH and Ryan Ramirez within one hundred fifty (150) miles of Washington Township, OH. See attached HIPAA forms.

DATED: October 15, 2019.

Respectfully submitted,

/s/ Marc E. Dann

Marc E. Dann (0039425)
Emily C. White (0085662)
Whitney E. Kaster (0091540)
DANN LAW
2728 Euclid Avenue, Suite 300
Cleveland, OH 44115
(216) 373-0539
notices@dannlaw.com

Thomas E. Bilek
Kelly Cox Bilek
THE BILEK LAW FIRM, L.L.P.
700 Louisiana, Suite 3950
Houston, TX 77002
(713) 227-7720
tbilek@bileklaw.com
kbilek@bileklaw.com

Kevin W. Thompson
David R. Barney, Jr.
THOMPSON BARNEY LAW FIRM
2030 Kanawha Boulevard, East
Charleston, WV 25311
Telephone: 304-343-4401
Facsimile: 304-343-4405
Email: kwthompson@gmail.com

Celeste Brustowicz
Stephen Wussow
COOPER LAW FIRM
1525 Religious Street
New Orleans, LA 70130
Telephone: 504-399-0009
Facsimile: 504-309-6989
Email: cbrustowicz@sch-llc.com

Donald E. Creadore
CREADORE LAW FIRM
450 Seventh Avenue, Suite 1408

New York, NY 10123
Telephone: 212-355-7200
Email: donald@creadorelawfirm.com

Scott R. Bickford
Spencer R. Doody
MARTZELL, BICKFORD & CENTOLA
338 Lafayette Street
New Orleans, LA 70130
Telephone: 504-581-9065
Facsimile: 504-581-7635
[Email: srb@mbfirm.com](mailto:srb@mbfirm.com)

Kent Harrison Robbins
THE LAW OFFICES OF KENT HARRISON
ROBBINS, P.A.
242 Northeast 27th Street
Miami, FL 33137
Telephone: (305) 532-0500
Facsimile: (305) 531-0150
Email: khr@khrlawoffices.com
Secondary: ereyes@khrlawoffices.com
Tertiary: assistant@khrlawoffices.com

CERTIFICATE OF SERVICE

A copy of the foregoing was filed via the Court's electronic filing system on October 15, 2019. Notice of this filing will be sent by e-mail through the Court's electronic case-filing system to all counsel of record.

/s/Celeste Brustowicz
Celeste Brustowicz